

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

LATOYA CANADA,

Plaintiff,

v.

Civil Action No. 3:21-cv-655

JASMINE MASRI,  
NEW PRIME, INC.,  
NEW PRIME d/b/a PRIME, INC.,  
NEW PRIME, INC. d/b/a PRIME, INC.,  
PRIME, INC.,  
PRIME TRANSPORTATION SERVICES, INC.,  
PRIME TRANSPORTATION, INC.,  
And  
JOHN DOE COMPANY

Defendants.

**JOINT NOTICE OF SETTLEMENT AND STIPULATION OF DISMISSAL**

Plaintiff, Latoya Canada, (“Plaintiff”), by counsel, and Defendants, Jasmine Masri, New Prime, Inc., New Prime d/b/a Prime Inc., New Prime, Inc. d/b/a PrimeInc., Prime Inc., Prime Transportation Services, Inc., and Prime Transportation, Inc. (“Defendants”), by counsel, hereby respectfully notify the Court that all matters in controversy between the parties and before this Court have been settled and resolved; and thus, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), provided that the Court will retain jurisdiction over this settlement specifically for the purpose of interpretation and/or enforcement of the Settlement Agreement and Release pursuant to the authority granted in *Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375 (1994), until all payments called for under the Settlement Agreement and Release have been made. The Parties do jointly submit this Stipulation of Dismissal of the above-captioned matter, WITH PREJUDICE.

DATED: June 13, 2022

Respectfully submitted,

LATOYA CANADA

/s/  
Emmet D. Alexander (VSB No. 41248)  
Alexander Law Group, PLC  
6601 Irongate Square, Suite A  
Richmond, VA 23234  
Telephone: (804) 271-1969  
Facsimile: (804) 271-0806  
[emmet@alexanderlawgroupplc.com](mailto:emmet@alexanderlawgroupplc.com)  
*Counsel for Plaintiff*

Michael R. Krol (VSB No. 80584)  
Robert G. Maury (VSB No. 88233)  
Maury & Krol, PLLC  
9840 Midlothian Turnpike, Suite A  
Richmond, VA 23235  
Telephone: (804)529-3647  
Facsimile: (804)315-1977  
[michael@maurykrol.com](mailto:michael@maurykrol.com)  
[robert@maurykrol.com](mailto:robert@maurykrol.com)  
*Counsel for Plaintiff*

NEW PRIME, INC.,  
NEW PRIME d/b/a PRIME, INC.,  
NEW PRIME, INC. d/b/a PRIME, INC.,  
PRIME, INC.,  
PRIME TRANSPORTATION SERVICES,  
INC.,  
PRIME TRANSPORTATION, INC.  
JASMINE MASRI

/s/  
Terrence L. Graves (VSB No. 32705)  
Karissa T. Kaseorg (VSB No. 87685)  
SANDS ANDERSON PC  
Bank of America Center, Ste. 2400  
1111 East Main Street (23219)  
P. O. Box 1998  
Richmond, VA 23218-1998  
Telephone: 804-783-7239  
Facsimile: 804-783-7291  
[tgraves@sandsanderson.com](mailto:tgraves@sandsanderson.com)  
[kkaseorg@sandsanderson.com](mailto:kkaseorg@sandsanderson.com)  
*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 15, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

Emmet D. Alexander (VSB No. 41248)  
Alexander Law Group, PLC  
6601 Irongate Square, Suite A  
Richmond, VA 23234  
Telephone: (804) 271-1969  
Facsimile: (804) 271-0806  
[emmet@alexanderlawgroup.com](mailto:emmet@alexanderlawgroup.com)  
*Counsel for Plaintiff*

Michael R. Krol (VSB No. 80584)  
Robert G. Maury (VSB No. 88233)  
Maury & Krol, PLLC  
9840 Midlothian Turnpike, Suite A  
Richmond, VA 23235  
Telephone: (804)529-3647  
Facsimile: (804)315-1977  
[michael@maurykrol.com](mailto:michael@maurykrol.com)  
*Counsel for Plaintiff*

\_\_\_\_\_/s/\_\_\_\_\_  
Terrence L. Graves (VSB No. 32705)  
Karissa T. Kaseorg (VSB No. 87685)  
SANDS ANDERSON PC  
Bank of America Center, Ste. 2400  
1111 East Main Street (23219)  
P. O. Box 1998  
Richmond, VA 23218-1998  
Telephone: 804-783-7239  
Facsimile: 804-783-7291  
[tgraves@sandsanderson.com](mailto:tgraves@sandsanderson.com)  
[kkaseorg@sandsanderson.com](mailto:kkaseorg@sandsanderson.com)  
*Counsel for Defendants*